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Attorneys for United Financial Casualty  
Company and The Progressive Corporation

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

YELLOWSTONE RENTAL	)	Cause No. <u><b>CV-21-79-BLG-SPW-TJC</b></u>
PROPERTIES, LLC,	)	
	)	
Plaintiff,	)	<b>UNITED FINANCIAL CASUALTY</b>
	)	<b>COMPANY AND THE</b>
vs.	)	<b>PROGRESSIVE CORPORATION'S</b>
	)	<b>NOTICE OF REMOVAL</b>
UNITED FINANCIAL CASUALTY	)	
COMPANY, THE PROGRESSIVE	)	
CORPORATION, BRYAN	)	
MCCLEAN, and MCCLEAN	)	
FAMILY INVESTMENTS dba	)	
MCCLEAN FAMILY INSURANCE	)	
AGENCY,	)	
	)	
Defendants.	)	
_____	)	

Defendants, United Financial Casualty Company ("UFCC") and The  
Progressive Corporation ("Progressive"), by and through their attorneys, Nelson  
Law Firm, P.C., as Defendants in *Yellowstone Rental Properties, LLC, vs. United*

*Financial Casualty Company, The Progressive Corporation, Bryan McClean, and McClean Family Investments dba McClean Family Insurance Agency*, Cause No. DV 21-0150 in the Thirteenth Montana Judicial District Court, Yellowstone County, hereby petitions for removal of the above-described cause of action to this Court and respectfully shows as follows:

1. The citizenship of the parties is diverse in that UFCC is an Ohio domiciliary, and is owned by Drive Insurance Holdings Inc. Drive Insurance Holdings Inc. (formerly called Progressive Agency Holdings Inc.) is a domiciliary of the state of Delaware, and is owned by The Progressive Corporation. The Progressive Corporation is a citizen of the state of Ohio. It is a publicly traded holding company. UFCC has been at all times pertinent to this litigation a citizen of the state of Ohio. Plaintiff, Yellowstone Rental Properties, LLC, is a Montana limited liability company in good standing, with its principal office in Billings, Montana. The amount in controversy, as claimed by Plaintiff, exceeds the jurisdictional amount. This Court therefore has original jurisdiction of the above-entitled action pursuant to 28 U.S.C. § 1332.

2. The amount in controversy is in excess of \$75,000.

3. The above-entitled cause of action is therefore proper for removal to this Court pursuant to 28 U.S.C. § 1441(a).

4. Progressive was served on June 17, 2021. Pursuant to Rule 12, Mont. R. Civ. P., Progressive has 21 days to appear, answer, or plead. Removal is therefore timely and proper pursuant to 28 U.S.C. § 1446(b).

5. Copies of all process, pleadings, and orders served upon Progressive in the above-entitled action are attached hereto and incorporated by reference herein as Exhibit A, as required by 28 U.S.C. § 1446(a).

Dated this 12<sup>th</sup> day of July, 2021.

/s/ Randall G. Nelson

Randall G. Nelson  
NELSON LAW FIRM, P.C.  
ATTORNEYS FOR UNITED  
FINANCIAL CASUALTY  
COMPANY AND THE  
PROGRESSIVE CORPORATION